

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ELEANOR TEDONE,

Civil Action No. 07 CV 4111

Plaintiff,

-against-

H.J. HEINZ COMPANY, OWENS- ILLINOIS,
INC., OWENS BROCKWAY GLASS
CONTAINER and MGM MIRAGE, INC.
d/b/a BORGATA HOTEL CASINO & SPA,

DEFENDANT H.J. HEINZ
COMPANY'S RULE 26(a)(1)
DISCLOSURES

Defendants.

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SIRS:

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant H.J. Heinz Company, by its attorneys Bonner Kiernan Trebach & Crociata, LLP, make the following disclosures upon information and belief:

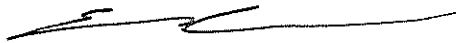
- (A) Defendant H.J. Heinz Company is currently unable to determine which individuals might have knowledge relevant to the above matter beyond any parties and persons referenced or revealed through the discovery.
- (B) None known at this time. Defendant H.J. Heinz Company refers plaintiff to all medical records obtained through discovery or otherwise produced in this litigation.
- (C) Not applicable.
- (D) To be provided.
- (E) Defendant H.J. Heinz Company has yet to select its expert witnesses, but expressly reserves the right to do so pursuant to the Federal Rules of Civil Procedure and the Court's Order(s)

PLEASE TAKE NOTICE that Defendant H.J. Heinz Company expressly reserves the right to supplement and/or amend in accordance with Federal Rules.

Dated: New York, New York
September 25, 2007

BONNER KIERNAN TREBACH
& CROCIATA, LLP
Attorneys for Defendant
Defendant H.J. Heinz Company
Empire State Building
Suite 3304
New York, New York 10118
(212) 268-7535

By:


Ewan M. Clark (EMC 2955)

TO: Hugh G. Jasne, Esq.
JASNE & FLORIO, L.L.P.
Attorneys for Plaintiff
525 N. Broadway, Suite 222
White Plains, New York 10603
(914) 997-1212